

REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks.

Claims 1-31 and 33-38 are pending in the application, with claims 1, 19, and 28-29 being independent. Claim 32 was previously canceled, and claims 30-31 and 33-38 are canceled herein without prejudice to or disclaimer of the subject matter recited therein. Claims 1, 6, 13, 15-21, and 28-29 are amended herein, and Claims 39-47 are added herein. Support for the claim amendments and additions can be found in the original disclosure. No new matter has been added.

STATEMENT OF SUBSTANCE OF INTERVIEW

Initially, Applicant wishes to thank Examiner Cao for conducting an interview with Applicant's representative, Elliott Y. Chen, on October 23, 2008. During the interview, the Examiner and the Applicant's representative discussed the rejections of Claims 1 and 7 under 35 U.S.C. §112, second paragraph, as well as under 35 U.S.C. §103(a).

§ 112 FIRST PARAGRAPH REJECTIONS

Claims 1-18, 29-31, and 33-36 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Applicant has canceled Claims 31 and 33-36. Additionally, Applicant has amended independent Claim 1 and 19 to address the deficiencies noted in the Office Action. Accordingly, since the remaining claims depend from Claims 1 and 19 and were rejected for the same reason as

the independent claims, Applicant respectfully requests reconsideration and withdrawal of the rejection.

§ 112 SECOND PARAGRAPH REJECTIONS

Claims 1-31 and 33-38 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicant has canceled Claims 31 and 33-38. Additionally, Applicant has amended independent Claim 1, 19, 28, and 29, as well as dependent claim 15, to address the deficiencies noted in the Office Action. Accordingly, since the remaining claims depend from Claims 1 and 19 and were rejected for the same reason as the independent claims, Applicant respectfully requests reconsideration and withdrawal of the rejection.

§ 103 REJECTIONS

Claims 1-8, 10-18, 29-31, 33, 36, and 38 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. 6,907,572 to Little et al. (hereinafter “Little”) in view of U.S. Pub. 2004/0143599 to Shalabi (hereinafter “Shalabi”). Claims 30-31, 33, 36, and 38 are canceled.

Independent Claim 1, as currently presented, recites:

1. A computer readable storage medium encoded with a first data structure and a second data structure, comprising:
a first parameter definition for a first input parameter, the first parameter definition to enable identification of an appropriate first input for the first input parameter, wherein the first parameter definition is a declared property of the first data structure;

a second parameter definition for a second input parameter, the second parameter definition to enable identification of an appropriate second input for the second input parameter, wherein the second parameter definition is a declared property of the second data structure; and
an instruction-based mechanism to use the first parameter definition to identify the appropriate first input for the first input parameter, and use the second parameter definition to identify the appropriate second input for the second input parameter,
wherein the instruction-based mechanism is to further enable the first data structure to process the first input parameter based on the appropriate first input identified from an input source to output an object, and provide the object as an input for the second input parameter to be processed by the second data structure by passing a reference of the object to the second data structure,
when the first and second data structures become instantiated into objects.

Applicant respectfully traverses the rejection. Specifically, as noted in the Office Action, “Little does not teach the input source comprising at least one pipelined live object outputted by a second data structure that is identical to the first data....” (Office Action, Page 6, Lines 10-17).

Thus, it follows since Little does not teach the “pipeline” of objects for processing, Little also does not teach or suggest, “wherein the instruction-based mechanism is to further enable the first data structure to process the first input parameter based on the appropriate first input identified from an input source to output an object, and provide the object as an input for the second input parameter to be processed by the second data structure *by passing a reference of the object to the second data structure,*” as recited in Claim 1. (Emphasis added).

Moreover, the deficiencies of Little with respect to this element are not remedied by the disclosure of Shalabi. Shalabi discloses that in a command interface known as

“Qptool,” the output of one command may be the input to another command. (Shalabi, Page 7, Paragraph 110). However, Shalabi does not teach or suggest that the results of one command are passed as input to another command *“by passing a reference of the object,”* as recited in Claim 1. (Emphasis added).

Instead, Shalabi discloses that the results of one command are passed as an XML file to another command. Specifically, Shalabi discloses issuing input commands 202, against an XML file 211 to generate an output XML file 226. (Shalabi, Page 7, Paragraph 103, Lines 7-9; Figure 8). Shalabi further discloses that the XML file 226 *“is fed back to command processor 222 for execution of subsequent input command.”* (Shalabi, Page 7, Paragraph 103, Lines 10-12; Figure 8).

Accordingly, the feeding back of an XML file 226, as disclosed by Shalabi, does not teach or suggest that the results of one command are passed as input to another command *“by passing a reference of the object,”* as recited in Claim 1. (Emphasis added). Thus, for at least the foregoing reasons, the cited references to Little and Shalabi, whether individually or in combination, do not teach, disclose, or fairly suggest every aspect of Claim 1.

Due to the Applicant’s earnest belief that the Claim 1, as rejected under Section 103(a), is allowable because its recited elements are not taught or suggested in the cited references, Applicant will not address motivation to combine with respect to Claim 1 during this response. However, Applicant hereby reserves the right to further challenge motivation to combine the cited references. Thus, for at least the foregoing reasons, Claim 1 is believed to be allowable over the cited references.

Dependent Claims 2-8 and 10-18 depend from independent Claim 1 and are allowable by virtue of this dependency, as well as for additional features that they recite.

Applicant also respectfully requests individual consideration of each dependent claim.

Independent Claim 29, as currently presented, recites:

29. A computer readable storage medium encoded with a first data structure and a second data structure, comprising:
- a first parameter definition for a first input parameter, the first parameter definition to enable identification of an appropriate first input for the first input parameter, wherein the first parameter definition is a declared property of the first data structure;
 - a second parameter definition for a second input parameter, the second parameter definition to enable identification of an appropriate second input for the second input parameter, wherein the second parameter definition is a declared property of the second data structure; and
 - an instruction-based mechanism to use the first parameter definition to identify the appropriate first input for the first input parameter, and use the second parameter definition to identify the appropriate second input for the second input parameter,
- wherein the instruction-based mechanism is to further enable the first data structure to process the first input parameter based on the appropriate first input identified from an input source to output an object as an input for the second input parameter, and enable the second data structure to process the object when the instruction-based mechanism identifies the object as the appropriate second input based on the second parameter definition.

Applicant respectfully traverses the rejection. Specifically, Little does not teach or suggest, “and enable the second data structure to process the object *when the instruction-based mechanism identifies the object as the appropriate second input based on the second parameter definition*,” as recited in Claim 29. Even assume, *in arguendo*,

Little discloses using a parameter definition to identify an appropriate input, Little does not teach or suggest identifying an object “as the appropriate second input based on the second parameter definition,” as recited in Claim 29, *when the object is the processed output of a first data structure*. This is because since Little does not teach or suggest using an output of a command as an input for a second command, Little cannot suggest validating an input that is also an output.

Second, the deficiencies of Little with respect to this element are not remedied by the disclosure of Shalabi. Shalabi discloses that the “output of one command may be the input of another.” (Shalabi, Page 7, Paragraph 110). However, Shalabi does not teach or even suggest that the output is validated in any way prior to being used as the input by another command.

Accordingly, Shalabi does not teach or suggest “*when the instruction-based mechanism identifies the object as the appropriate second input based on the second parameter definition*”, as recited in Claim 29. Thus, for at least the foregoing reasons, the cited references to Little and Shalabi, whether individually or in combination, do not teach, disclose, or fairly suggest every aspect of Claim 29.

Due to the Applicant’s earnest belief that the Claim 29, as rejected under Section 103(a), is allowable because its recited elements are not taught or suggested in the cited references, Applicant will not address motivation to combine with respect to Claim 29 during this response. However, Applicant hereby reserves the right to further challenge motivation to combine the cited references. Thus, for at least the foregoing reasons, Claim 29 is believed to be allowable over the cited references.

Claims 19-23, 26, 28 and 37 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. 6,286,035 to Gillis et al. (hereinafter "Gillis") in view of U.S. 6,907,572 to Little et al. (hereinafter "Little"). Claim 37 is canceled.

Independent Claim 19, as currently presented, recites:

19. A computer-executable method for processing an input source, the method comprising:
retrieving a first parameter definition for a first input parameter, the first parameter definition to enable identification of an appropriate first input for the first input parameter, wherein the first parameter definition is a declared property of a first data structure;
retrieving a second parameter definition for a second input parameter, the second parameter definition to enable identification of an appropriate second input for the second input parameter, wherein the second parameter definition is a declared property of a second data structure;
identifying the appropriate first input from an input source based on the first parameter definition;
processing the first input parameter on the first data structure using the appropriate first input to output an object;
providing the object as an input for the second input parameter by passing a reference of the object to the second data structure; and
processing the object on the second data structure.

Applicant respectfully traverses the rejection. Specifically, Gillis does not teach or suggest, "providing the object as an input for the second input parameter by passing a reference of the object to the second data structure," as recited in Claim 19.

Gillis discloses parsing and validating command messages produced by a network element in a network by utilizing a table-driven approach. (Gillis, Abstract). However,

Gillis does not disclose, *"by passing a reference of the object to the second data structure,"* as recited element of Claim 19. (Emphasis added).

Moreover, the deficiencies of Gillis with respect to this element are not remedied by Little. As noted in the Office Action, Little does not disclose the "pipeline" of objects for processing. (Office Action, Page 6, Lines 10-17). Accordingly, Little also cannot teach or suggest, "providing the object as an input for the second input parameter by passing a reference of the object to the second data structure," as recited in Claim 19.

Due to the Applicant's earnest belief that the Claim 19, as rejected under Section 103(a), is allowable because its recited elements are not taught or suggested in the cited references, Applicant will not address motivation to combine with respect to Claim 19 during this response. However, Applicant hereby reserves the right to further challenge motivation to combine the cited references. Thus, for at least the foregoing reasons, Claim 19 is believed to be allowable over the cited references.

Dependent Claims 20-23 and 26 depend from independent Claim 19 and are allowable by virtue of this dependency, as well as for additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

Independent Claim 28, as currently presented, recites:

28. A system to handle input parameters, the system comprising:
- a means for processing; and
 - a memory means, the memory means being allocated for a plurality of computer-executable instructions which are loaded into the memory means for execution by the means for processing, the computer-executable instructions performing a method comprising:

- a means for retrieving a first parameter definition for a first input parameter, the first parameter definition to enable identification of an appropriate first input for the first input parameter, wherein the first parameter definition is a declared property of a first data structure;
- a means for retrieving a second parameter definition for a second input parameter, the second parameter definition to enable identification of an appropriate second input for the second input parameter, wherein the second parameter definition is a declared property of a second data structure; and
- a means for identifying the appropriate first input from an input source based on the first parameter definition,
- a means for processing the first input parameter on the first data structure using the appropriate first input to output an object as an input for the second input parameter by passing a reference of the object to the second data structure; and
- a means for processing the object on the second data structure when the object is identified as the appropriate second input based on the second parameter definition.

Applicant respectfully traverses the rejection. First, Applicant incorporates the reasoning presented above in response to the rejection of Claim 19 under 35 U.S.C. § 103(a) to the extent that Claims 19 and 28 recite similar features. Accordingly, Applicant respectfully submits that the cited references to Gillis and Little, whether individually or in combination, do not teach, disclose, or fairly suggest, “a means for processing the first input parameter on the first data structure using the appropriate first input to output an object as an input for the second input parameter *by passing a reference of the object to the second data structure,*” as recited in Claim 28. (Emphasis added).

Due to the Applicant’s earnest belief that the Claim 28, as rejected under Section 103(a), is allowable because its recited elements are not taught or suggested in the cited references, Applicant will not address motivation to combine with respect to Claim 28 during this response. However, Applicant hereby reserves the right to further challenge motivation to combine the cited references. Thus, for at least the foregoing reasons, Claim 28 is believed to be allowable over the cited references.

Dependent Claims 34-35 stand rejected under 35 U.S.C. § 103(a) as being obvious over Little, Gillis, in view of U.S. Pub. 2004/0143599 to Shalabi et al. (hereinafter “Shalabi”). Claims 34-35 are canceled.

Dependent Claims 25 and 27 stand rejected under 35 U.S.C. § 103(a) as being obvious over Gillis, Little, and in further view of U.S. 6,405,365 to Lee et al. (hereinafter “Lee”). Dependent Claims 25 and 27 depend from Independent Claim 19.

Applicant respectfully traverses the rejection. First, Applicant incorporates the reasoning presented above in response to the rejection of Claim 19 under 35 U.S.C. § 103(a). Accordingly, Applicant respectfully submits that the cited references to Gillis and Little, whether individually or in combination, do not teach, disclose, or fairly suggest, “providing the object as an input for the second input parameter by passing a reference of the object to the second data structure,” as recited in Claim 19. (Emphasis added).

Moreover, the deficiencies of Gillis and Little with respect to this element are also not remedied by Shalabi. Shalabi discloses that in a command interface known as “Qptool,” the output of one command may be the input to another command. (Shalabi, Page 7, Paragraph 110). However, Shalabi does not teach or suggest that the results of one command are passed as input to another command *“by passing a reference of the object,”* as recited in Claim 19. (Emphasis added).

Instead, Shalabi discloses that the results of one command are passed as an XML file to another command. Specifically, Shalabi discloses issuing input commands 202, against an XML file 211 to generate an output XML file 226. (Shalabi, Page 7, Paragraph 103, Lines 7-9; Figure 8). Shalabi further discloses that the XML file 226 “is fed back to

command processor 222 for execution of subsequent input command.” (Shalabi, Page 7, Paragraph 103, Lines 10-12; Figure 8).

Accordingly, the feeding back of an XML file 226, as disclosed by Shalabi, does not teach or suggest that the results of one command are passed as input to another command by passing a reference of the object. Thus, the cited references, whether individually or in combination, does not teach, disclose, or fairly suggest, “providing the object as an input for the second input parameter *by passing a reference of the object to the second data structure,*” as recited in Claim 19. (Emphasis added).

Moreover, since dependent Claims 25 and 27 depend from Independent Claim 19, they are believed to be allowable at least by virtue of this dependency, as well as for additional features that they recite.

Dependent Claim 9 stands rejected under 35 U.S.C. § 103(a) as being obvious over Little, Shalabi and in further view of Jones (Parse and Validate Command Line Parameters with VB.NET. (hereinafter “Jones”). Dependent Claim 9 depends from independent Claim 1.

Applicant respectfully traverses the rejection. First, Applicant incorporates the reasoning presented above in response to the rejection of Claim 1 under 35 U.S.C. § 103(a). Accordingly, Applicant respectfully submits that the cited references to Little and Shalabi, whether Individually or in combination, do not teach, disclose, or fairly suggest, “provide the object as an input for the second input parameter to be processed by the second data structure *by passing a reference of the object to the second data structure,*” as recited in Claim 1. (Emphasis added).

Moreover, the deficiencies of little and Shalabi with respect to this element are also not remedied by Jones. Jones discloses that in VB.Net, a passed command line may

be obtained via the Command {} function. (Jones, Page 2, Paragraph 2, Lines 1-2). However, the disclosures of Jones are not relevant to “provide the object as an input for the second input parameter to be processed by the second data structure *by passing a reference of the object to the second data structure*,” as recited in Claim 1.

Thus, the cited references, whether individually or in combination, does not teach, disclose, or fairly suggest every aspect of Claim 1. Moreover, since dependent Claim 9 depends from independent Claim 1, it is believed to be allowable at least by virtue of this dependency, as well as for additional features recited.

Dependent Claim 24 stands rejected under 35 U.S.C. § 103(a) as being obvious over Little, Gillis, and in further view of U.S. 6,658,625 to Allen et al. (hereinafter “Allen”). Dependent Claim 24 depends from independent Claim 19.

Applicant respectfully traverses the rejection. First, Applicant incorporates the reasoning presented above in response to the rejection of Claim 19 under 35 U.S.C. § 103(a). Accordingly, Applicant respectfully submits that the cited references to Little and Gillis, whether individually or in combination, do not teach, disclose, or fairly suggest, “provide the object as an input for the second input parameter to be processed by the second data structure *by passing a reference of the object to the second data structure*,” as recited in Claim 19. (Emphasis added).

Moreover, the deficiencies of little and Gillis with respect to this element are also not remedied by Allen. Allen discloses a parser that is capable of validate and parse an XML document using the Document Type Definition (DTD) of the document. (Allen, Column 19, Lines 35-36). Allen also discloses a Program Call Markup Language (PCML) data description that provides configurable data definitions. (Allen, Column 6, Lines 35-42). However, the disclosures of Allen are not relevant to “provide the object as an input

for the second input parameter to be processed by the second data structure *by passing a reference of the object to the second data structure,*” as recited in Claim 19.

Thus, the cited references, whether individually or in combination, does not teach, disclose, or fairly suggest every aspect of Claim 19. Moreover, since dependent Claim 24 depends from independent Claim 19, it is believed to be allowable at least by virtue of this dependency, as well as for additional features recited.

Newly added **Dependent Claims 39-47** depend from independent Claim 29 and are allowable by virtue of this dependency, as well as for additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

In closing, Applicant’s decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that Applicant concurs with the conclusions set forth in the Office Action that these dependent claims are not patentable over the disclosure in the cited references. Similarly, Applicant’s decision not to discuss differences between the prior art and every claim element, or every comment set forth in the Office Action, should not be considered as an admission that Applicant concurs with the interpretation and assertions presented in the Office Action regarding those claims. Indeed, Applicant believes that all of the dependent claims patentably distinguish over the references cited. Moreover, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend.

CONCLUSION

For at least the foregoing reasons, Claims 1-29 and 39-47 are in condition for allowance. Applicant respectfully requests reconsideration and withdrawal of the rejections and an early notice of allowance.

If any issue remains unresolved that would prevent allowance of this case,
Applicant requests that the Examiner contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

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